

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

Maria Suarez,)	
)	
)	
Plaintiff(s),)	
)	Case No.
-against-)	19-cv-07271(GRB)(LGD)
)	
Southern Glazer's Wine and Spirits of New York,)	
LLC,)	
)	
Defendant(s).)	

DECLARATION OF MARIA SUAREZ

I, Maria Suarez, pursuant to 28 U.S.C. § 1746, declare as follows:

1. On May 2, 2013, While reviewing payroll records for my department, I noticed that the three women in my department were classified as “admin” (or “clerical”) while the only male in her department was classified as “warehouse.”
2. The last annual performance appraisal I received was on May 20, 2014. This covered the 2013 calendar year.
3. I did not receive annual performance reviews for the years 2014, 2015.
4. I do not remember receiving annual performance appraisals for 2016 or 2017.
5. Kevin Randall did not interview me before I was reclassified from a “Manager” to an “Administrator.”
6. When Kevin Randall and John Wilkinson told me to apply for the WMI Administrator position, they said that the decision had already been made to give Tonisha Durant the Inventory Control Manager position in the warehouse, and therefore I would not be able to have that position.

7. When WMI was first implemented, there were approximately 1,000 inventory discrepancies each day.

8. I did my best to keep up with the number of inventory discrepancies that were generated each day.

9. When I was the Inventory Control Manager, I was the communicator between the warehouse and accounting.

10. Before WMI was implemented, Kevin Randall and John Wilkinson told me to sit in on WMI meetings for several hours a day over the course of several weeks.

11. The focus of these meetings was information technology. There was no training targeted to me as WMI Administrator.

12. Randall and Wilkinson told me that I should bring my laptop to the meetings and continue doing my regular job as Inventory Control Manager. I did as I was told.

13. When I became an Administrator, I did not have the ability to “write off” \$1.7 million in inventory.

14. No one ever approached me about “writing off” \$1.7 million in inventory on December 5, 2016.

15. In early September 2016, John Wilkinson issued a memo to me titled “WMI Administrator Performance.” This was the first such Memo I had ever received in my entire career at Southern.

16. Approximately one week after I testified in the discrimination case brought by Josianne Sajous against Southern, John Wilkinson came into my office and told me: “get your things together, you are moving.” I loaded my docking station, monitor, papers and personal belonging onto my office chair and pushed the chair in front of me, following John Wilkinson. I

was relocated to the blue room (a common space used by warehouse supervisors and warehousemen located on the warehouse floor).

I declare under the penalty of perjury that the foregoing is true and correct.

Dated: 3/9/2023

Maria Suarez

ID TRratux27mvjrsABNRuDCQU2

Maria Suarez

eSignature Details

Signer ID:	TRratux27mvjrsABNRuDCQU2
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